IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

:

ROBERT JOSEPH GORDON : CASE NO. 1:11-bk-07705

ANNETTE GORDON :

aka Annie Gordon :

Debtors

MOTION TO REOPEN CLOSED CASE

COMES NOW, the Debtor, by and through Dorothy L. Mott, Esquire, and makes this Motion, respectfully stating in support thereof:

- 1. The Debtor filed a voluntary Chapter 13 Petition on November 15, 2011.
- 2. The Debtor's discharge was granted on February 8, 2017 and the case was closed thereafter.
- 3. A party has violated the discharge injunction and the Debtors seek to reopen the case to remedy the party's violations.

WHEREFORE, the Debtors respectfully request that this Honorable Court reopen the above—captioned closed bankruptcy proceeding for the purpose of filing a Motion for a Contempt Order.

Respectfully submitted,

/s/ Dorothy L. Mott Mott & Gendron Law 125 State Street Harrisburg, PA 17101 (717) 232–6650 TEL (717) 232-0477 FAX doriemott@aol.com

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ORDER

UPON consideration of the foregoing Motion to reopen the closed bankruptcy proceeding, good reason appearing therefor, it is

HEREBY ORDERED AND DECREED that the above–captioned proceeding be and hereby is reopened.